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HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

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MONTY J. BOOTH, ATTORNEY AT LAW, P.S., a Washington corporation, individually and on behalf of a class of Washington businesses similarly situated,

Plaintiff,

v.

Case No. 2:13-cv-01533-JLR

DECLARATION OF JEFFREY A. HANSEN IN SUPPORT OF PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

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APPSTACK, INC., a Delaware corporation; STEVE ESPINOSA, individually; and JOHN ZDANOWSKI, individually,

Defendants.

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DECLARATION OF JEFFREY A. HANSEN - 6

CASE NO. 2:13-CV-01533-JLR
EXPERT REPORT OF JEFFREY A. HANSEN

1.   My name is Jeffrey A. Hansen. I am an adult over the age of 18, a resident of the state of California, and I reside at 2625 Kings View Circle, Spring Valley, CA 91977. Unless indicated otherwise, I have personal knowledge of each of the matters stated herein, and if called to testify I could and would testify competently about them.

2.   I have been retained in this case at a rate of $300 per hour, for all services rendered, and $380 per hour for depositions.

3.   I am the principal of Hansen Legal Technologies, Inc. My firm is in the business of handling Information Technology, including investigations and analysis of electronic data. I have served as an expert or consultant in more than 50 TCPA class action lawsuits and as an expert or consultant in numerous other civil cases. My resume is attached hereto as Exhibit 1.

4.   Plaintiff's counsel retained my firm to evaluate and analyze electronic data related to outbound calls to wireless numbers nationally and in the state of Washington. My expert report in this matter is attached hereto as Exhibit 2.

5.   Since preparing my report, I have been asked to respond to certain issues raised by Defendant AppStack's expert, Anthony Fischer. Specifically, I have been asked to (1) provide a method for identifying the physical location or termination point of a call made to telephones other than hardwire landlines; and (2) reanalyze the call data to exclude those calls that do not appear to have been answered and where no voice mail message was left.

Call Termination Points

6.   Telephone calls to landlines that are hardwired in a physical location, terminate at the physical location – usually the billing or mailing address.

7.   Telephone calls to cellular telephones, soft phones, and VOIP (voice over internet protocol) phones do not necessarily terminate at the same physical location as the billing or mailing address because these phones are portable.

8.   With respect to portable phones, a two-step process may be utilized to determine the physical location of where a call terminated.

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9.   The first step requires the use of a reverse look-up directory. That is, using a database that contains the business names, addresses, and telephone numbers, I can match the telephone numbers in that database to those contained in AppStack's outbound dialing list (the database I analyzed to determine the number of calls); thus, obtaining the address of the business. The best source of such information is usually the telemarketing list that was used to input telephone numbers into the dialer.

10.   In this case, AppStack obtained a telemarketing list that contained not only telephone numbers, but also the business names and addresses that go along with those numbers. By importing this list into the database I created for the calling data, I identified names and addresses for 8,460 of the 11,219 numbers unique to Washington State. Other databases may be used to obtain the names and addresses of the remaining telephone numbers contained in AppStack's outbound dialing list, such as LexisNexis.

11.   The second step involves reviewing the billing records of the identified businesses. That is, once the business names and addresses are obtained, notice may be sent to each of these businesses requesting billing records. As AppStack's expert, Anthony Fischer pointed out in his deposition, these billing records should show the physical location of the telephone when it was answered.
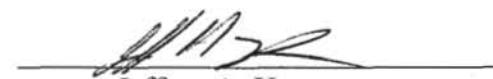
Reanalysis of Call Data

12.   After I performed the analysis of the call data set forth in Exhibit 1, it came to my attention that certain calls reflected a call length of .1 minutes – or six seconds. A call length of this duration indicates to me that no message was received by the caller. Likely the called party answered and immediately hung up or an answering machine was detected and the dialer immediately hung up on the call. Therefore, I have reanalyzed the data to eliminate the calls reflecting a .1 call duration. The revised data is as follows:

	Landlines	Cellular	Total
Nationwide Total Calls Made	3,241,873	601,207	3,843,080

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	Landlines	Cellular	Total
Nationwide Unique Numbers Called	481,751	90,163	571,914
Average Call Per Unique Number	6.7	6.7	6.7
Washington Total Calls Made	53,665	15,465	69,130
Washington Unique Numbers Calls	8,861	2,331	11,192
Average Call Per Unique Number	6.1	6.6	6.2

I declare under penalty of perjury of the laws of the United States and the State of Washington that the foregoing is true and correct. Dated this _13_ day of November, 2014.

_____
Jeffrey A. Hansen

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CERTIFICATE OF SERVICE

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I, Mary B. Reiten, hereby certify that on November 14, 2014, I electronically filed the

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foregoing with the Clerk of the Court using the CM/ECF system which will send notification of

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such filing to the following:

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        Anne Cohen, WSBA #41183

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        Email: acohen@smithfreed.com
        Gavin E. Gruber, *Admitted Pro Hac Vice*

7

        Email: ggruber@smithfreed.com
        Legal Assistant: Sandra Reust

8

        sandra@smithfreed.com
        SMITH FREED & EBERHARD, P.C.

9

        111 SW 5th Avenue, Suite 4300

10

        Portland, Oregon 97204
        Telephone: (503) 227-2424

11

        Facsimile: (503) 227-2535

12

        Attorneys for Defendants

13

DATED this 14th day of November, 2014.

14

        TERRELL MARSHALL DAUDT & WILLIE PLLC

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        By: /s/ Mary B. Reiten, WSBA #33623

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        Mary B. Reiten, WSBA #33623
        Email: mreiten@tmdwlaw.com

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        936 North 34th Street, Suite 300
        Seattle, Washington 98103

19

        Telephone: (206) 816-6603
        Facsimile: (206) 350-3528

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        Attorney for Plaintiff

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        CASE NO. 2:13-CV-01533-JLR
        DECLARATION OF JEFFREY A. HANSEN IN

27

        SUPPORT OF PLAINTIFF'S MOTION FOR CLASS
        CERTIFICATION

DECLARATION OF JEFFREY A. HANSEN - 10

— **EXHIBIT 1** —

DECLARATION OF JEFFREY A. HANSEN - 6

Jeffrey A. Hansen
Spring Valley, CA 91977
(619) 270-2363
Email: Jeff@TCPAwitness.com

SUMMARY OF QUALIFICATIONS:

IT certified professional with over 20 years of extensive troubleshooting experience

PROFESSIONAL EXPERIENCE:

Testified in the following:

I have been called to testify in *Craig Casey v. Valley Center Insurance Agency Inc.* (San Diego Superior Court Case No: 37-2008-00004378-SC-SC-CTL), *Stemple v. QC Holdings* (Southern District of California Case no: 12-CV-1997-CAB-WVG), *Hahn v. Massage Envy Franchising,* (Southern District of California Case No: 3:12-cv-00153-DMS-BGS), *Abdeljalil v. General Electric Capital Corporation,* (Southern District of California Case No: 12-cv-02078-JAH-MDD), *Jasminda Webb v. Healthcare Revenue Recovery Group, LLC.* (Northern District of California Case No: C 13-0737 JD), *AMANDA BALSCHMITER v TD AUTO FINANCE, LLC* (UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN Case No: 2:13-cv-01186), *Jordan Marks v Crunch San Diego, LLC* (Southern District of California Case No. 14-CV-0348-BAS (BLM)), *Peter Olney v Job.com* (Eastern District of California Case No: 1:12-cv-01724-LJO-SKO), *Carlos Guarisma v ADCAHB Medical Coverages, Inc. and Blue Cross and Blue Shield of Florida, Inc.* (Southern District of Florida Case No: 1:13-cv-21016-JLK), Farid *Mashiri v Ocwen Loan Servicing*, LLC (Southern District of California Case No: 3:12-cv-02838), *Monty J. Booth, Attorney at Law, P.S. v Appstack, Inc.* (Western District of Washington Case No. 2:13-cv-01533-JLR), and I have served as an expert in over fifty (50) TCPA class action lawsuits.

2013-Present   Founder
Hansen Legal Technologies, Inc., San Diego, CA
- Established and incorporated Hansen Legal Technologies, Inc. in 2013
- Developed operating procedures for computer forensic examinations.
- Developed proper protocols in preserving electronic evidence and following chain of custody.
- Provided Forensic services for clients for class action, civil, and other consumer cases.
- Oversee all discovery phase of cases.
- Assist counsel in interrogatories, depositions, and meet and confer meetings.
- Participated in Meet and Confer, 26f conferences and misc pre-trial meetings.
- Assisted counsel in developing litigation strategies in cases
- Assisted counsel in preparing discovery including interrogatories and document requests
- Assisted counsel in evaluating responses to interrogatories and document requests
- Assisted counsel in witness examination in depositions.
- Prepaired declarations for Class Certifications, and for Motions for Summary Judgement.

2007-2013   Co-Founder
Hansen and Levey Forensics, Ft Lauderdale, FL
- Established and incorporated Hansen & Levey Forensics, Inc in 2007
- Established secure forensics laboratory for the San Diego office.
- Developed operating procedures for computer forensic examinations.
- Developed proper protocols in preserving electronic evidence and following chain of custody.
- Provided Forensic services for clients for class action, employment, civil, domestic, and juvenile cases.
- Oversee all discovery phase of cases.
- Assist counsel in interrogatories, depositions, and meet and confer meetings, and preparation for sanction hearings against opposing counsel and parties.
- Participated in Meet and Confer, 26f conferences and misc pre-trial meetings.
- Assisted counsel in developing litigation strategies in cases
- Assisted counsel in preparing discovery including interrogatories and document requests
- Assisted counsel in evaluating responses to interrogatories and document requests

DECLARATION OF JEFFREY A. HANSEN - 7

- Assisted counsel in witness examination in depositions
- Performed on site acquisitions.
- Participated in mediation sessions.
- Provided Expert Testimony in Craig Casey vs. Valley Center Insurance Agency Inc.

2000-Present   Owner
Pns724 San Diego, CA
- Provided complete IT solutions for hundreds of businesses and individuals including network design, configuration, forensics, and data recovery.
- Set up and maintained 672 line outbound call center with numerous auto dialers and predictive dialers. Maintained call lists, and DNC lists used to place hundreds of millions of calls over a five year period.
- Installed hundreds of POTS lines, "Turned up" at least 38 T1's and PRI's.

2006   San Diego Regional Computer Forensics Laboratory (FBI sponsored computer forensics Lab)
- Built several forensic machines with large fiber channel RAID assemblies for use in the field.
- Installed and configured systems for mobile laboratory
- Provided support in all areas from taking in evidence to calling case agents to pick up their evidence from finished cases gaining valuable experience in evidence handling.

2004-Present   Systems Analyst
Amsec San Diego, CA / Lateott Bremerton, WA / HP Enterprise Services
- Provided ATM and Ethernet fiber connectivity for secure and unsecured DOD networks.
- Troubleshot fiber connectivity issues on shore and ship facilities.

2000-2004   Director of Training/ IT Director
Laptop Training Solutions, San Diego, CA

- Provided Intrusion detection, incident response, and forensic services in a continuing effort keep the network and workstations secure.
- Planned, designed, and implemented network security for vital network services for 4 facilities, that were heavily attacked by varying methods, saving the company hundreds of thousands of dollars.
- Performed security risk assessment, performed IT control audits, developed countermeasures and provided a security policy to insure confidentiality, integrity and availability of resources.
- Performed Gap Analysis of existing systems and desired systems and migrated from Windows 2000 DNS and Exchange 2000 servers to Linux servers running Postfix and BIND to provide a more scalable network for 4 facilities providing the company the means to achieve a 450% growth.
- Planned, installed and maintained several school networks involving numerous Domain Controllers, UNIX servers, print servers, multiple nodes and routers.
- Installed and programmed Nortel phone system improving the company's ability to handle calls.
- Planned, organized and instructed computer certification courses including Microsoft Certified Systems Engineer (NT4.0, Win2000 MCSE, 2003 MCSE), Cisco (CCNA), A+, N+, Linux+, I-Net+, Security+, MOUS and   Web Page Design (HTML, Javascript, DHTML, Flash 4, Flash 5, Fireworks3, Photoshop 5) resulting in hundreds of certified students.
- Provided students with a hands on training environment involving networks with Multiple Windows NT and Windows 2000 Domain Controllers, several workstations (Windows 95,98,NT,ME, and 2000 Professional), Novell, Unix, and Exchange Servers, and Cisco routers.
- Planned, organized and instructed a corporate training environment for TCP/IP which included addressing, standards, troubleshooting, subnetting, routing and Frame Relay
- Provided long distance support via telephone to hundreds of MCSE students throughout the country.
- Managed other instructors on training techniques for the MCSE, CCNA, Linux+, A+, Security+ and Network + courses providing a consistent system of training in all facilities.

1998-2000   Electronic Test Technician 3
Action Instruments, San Diego, CA
- Tested various types of electronics for industry and signal conditioning.

DECLARATION OF JEFFREY A. HANSEN - 8

- Troubleshot and documented nearly 10,000 component level repairs.
- Assisted in improvements to the manufacturing process.
- Identified problems in product design and provided solutions to correct the problems.

1996-1997   Network, Computer and Computer Monitor Technician /Instructor
        United States Navy, Shore Intermediate Maintenance Activity, San Diego, CA
- Installed and connectorized fiber optic computer networks throughout Naval Station San Diego and North Island.
- Provided network troubleshooting and management for large scale mission-critical DoD networks with over 600 nodes, routers, and servers.
- Provided upgrades, maintenance, troubleshooting, security, and repair of personal computers for 600 station LAN and the US Pacific Fleet.
- Troubleshot and repaired over 100 computer monitors to component level without technical manuals.
- Increased successful monitor repair from 10% to 95%.
- Trained shop personnel on computer monitor troubleshooting and repair.
- Researched parts, materials and techniques for Computer Monitor repair.
- Developed curriculum and instructed monitor troubleshooting and repair for the Navy Microcomputer Repair course.

1993-1996   Electronics Technician / Computer Technician
        United States Navy, USS Mahlon S. Tisdale (FFG-27), Combat Systems Division.
- Provided incident response and performed forensic type of services for 36 computers following Employee sabotage.
- Troubleshot and maintained Harris 300 AN/UYK-62(V) mini-mainframe, running Vulcan OS, and all terminals
- Troubleshot, maintained, and upgraded hardware and software for 36 shipboard computers.
- Identified security threats, and developed countermeasures for computer systems on board.
- Troubleshot, repaired and maintained – at component level - various Univac systems making up a complex network of computers used in communications, navigation, and weapons guidance.
- Assisted in planning and running work center.

1990-1992   Radio, Television, VCR Technician
        LBJ Television, Wheat Ridge, CO
- Performed component level troubleshooting of televisions, VCRs, and stereos.
- Performed in home repair of televisions.
- Introduced the repair of CD players to the company.
- Provided technical support to customers over the telephone.
- Handled customer service issues related to television repair.

CERTIFICATIONS:

MCP 4.0, A+, Network+, MCP 2000, MCSA, MCSE, Linux+, I-Net+, Security+, CIW Security Analyst.

Certified by Bureau For Private Postsecondary And Vocational Education, in the States of California and Oregon, as an Instructor for Computer Installation and Repair Technology, Computer Systems Networking and Telecommunications, Micro Computer Applications, Microsoft, Windows, Excel

GUEST APPEARANCES:

- Featured in Microsoft Redmond Magazine Sep 2007
- Computer Talk 760 KFMB San Diego, CA
- Computer Bits KBNP 1410AM and KOHI 1600 Portland, OR
- San Diego Profiler 760 KFMB San Diego, CA

PUBLIC POSITIONS:

DECLARATION OF JEFFREY A. HANSEN - 9

June 2012-Present   Board Member, Spring Valley Community Planning Group

       Elected board member of the Spring Valley Community Planning Group from April 2012 to Present. The purpose of the group is to advise the San Diego County Department of Planning and Land Use, the Planning Commission and the Board of Supervisors on matters of planning and land use affecting Spring Valley south of Highway 94. Members are volunteers and locally elected representing the interests of the people of Spring Valley. Items heard by the group include but are not limited to: Site Plans, Signs, Roads & Infrastructure, Parks & Recreation, Lot Splits, 2nd Dwelling Units, Day Care, Alcohol License, Tree Removal, Re-Zones.

EDUCATION:
2006   Access Data Forensic Toolkit
       San Diego Regional Computer Forensics Laboratory, San Diego, CA
2006   Guidance Software Encase Forensic Suite
       San Diego Regional Computer Forensics Laboratory, San Diego, CA
2005   E-discovery – Why Digital is different – by Craig Ball
       San Diego County Bar Association, San Diego, CA
2003   Security: Hardening MS Windows 2000 Server Family, IIS and Exchange 2000 Servers
       CBI Systems Integrators, San Diego, CA
1996   Navy Standard Microcomputer Repair
       PRC Inc., San Diego, CA
1996   Fundamentals of Total Quality Management/ Team Skills and Concepts
       Shore Intermediate Maintenance Activity, San Diego, CA
1993   AN/SPS-55 Surface Search Radar
       Service School Command, San Diego, CA
1993   Advanced Electronics School, Communication Systems and Radar Systems
       Naval Training Center, Great Lakes, IL
1992   Electronic Theory
       Naval Training Center, Orlando, FL
1990-1991   Radio, Television, VCR Repair
       Warren Occupational Technical Center, Golden, CO
1989-1990   Electronic Theory
       Warren Occupational Technical Center, Golden, CO
1991   Columbine Sr. High School, Littleton, CO

SECURITY CLEARANCE: Secret

References available on request

DECLARATION OF JEFFREY A. HANSEN - 10

— **EXHIBIT 2** —

1   HONORABLE JAMES L. ROBART

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5   **UNITED STATES DISTRICT COURT**
     WESTERN DISTRICT OF WASHINGTON

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     MONTY J. BOOTH, ATTORNEY AT LAW,   Case No. 2:13-cv-01533-JLR
7   P.S., a Washington corporation, individually and
     on behalf of a class of Washington businesses
8   similarly situated,
                                                RULE 26(a)(2)(b) EXPERT DISCLOSURE
9   **AND WRITTEN REPORT OF**
                    Plaintiff,   **JEFFREY A. HANSEN**
10   *v.*

11   APPSTACK, INC., a Delaware corporation;
     STEVE ESPINOSA, individually; and JOHN
12   ZDANOWSKI, individually,

13   *Defendants.*

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EXPERT REPORT OF JEFFREY A. HANSEN

My name is Jeffrey A. Hansen. I am an adult over the age of 18, a resident of the state of California, and I reside at 2625 Kings View Circle, Spring Valley, CA 91977. Unless indicated otherwise, I have personal knowledge of each of the matters stated herein, and if called to testify I could and would testify competently about them.

I was asked to prepare this report by Plaintiff's counsel in the above-captioned matter, Terrell Marshall Daudt & Willie PLLC, in support of Plaintiff's Designation of Expert Witnesses Pursuant to Fed. R. Civ. P. 26(a)(2)(b) executed on September 26, 2014.

I have been retained in this case at a rate of $300 per hour, for all services rendered, and $380 per hour for depositions.

Experience and Credentials.

I am the principal of Hansen Legal Technologies, Inc. My firm is in the business of handling Information Technology, including investigations and analysis of electronic data. I have served as an expert or consultant in more than 50 TCPA class action lawsuits and as an expert or consultant in numerous other civil cases.

With regard to my experience as an expert and consultant in legal matters, generally, I have frequently served as an expert witness and consultant to law firms in conducting computer forensic analyses. I have also assisted in electronic discovery issues.

Specific to this case, my firm was retained to assist Plaintiff and his counsel in evaluating and analyzing electronic data related to outbound calls to wireless numbers nationally and in the state of Washington. In that respect, I have extensive experience with compiling lists of calls related to telemarketing and autodialers in general. I am familiar with the procedures involved in such practices, and I have personally engaged in the compilation of certain lists, including demographic and target audience lists for telemarketing. I have personally repaired defective lists to eliminate improperly formatted and corrupted data.

I frequently act as a consultant to companies that engage in the use of autodialers. I am familiar with an autodialer's technical aspects, use, and procedures in these businesses. In this

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1 capacity, I have assembled, configured, maintained, and operated all aspects of autodialers and

2 interfaced with the telecommunications providers through whose networks the autodialers operate.

3   I have set up and maintained all aspects of predictive dialers and autodialers, from predictive

4 dialers operating with just three telephone lines to predictive dialers utilized by outbound call centers

5 with over 1,000 phone lines. When building these systems, I have used various software and hardware

6 solutions for predictive dialers and autodialers, both proprietary and open source, and customized

7 those systems for their particular uses. I, myself, have used and maintained predictive dialers and

8 autodialers and have trained others to do the same.

9   Further, I am familiar with the manner in which outbound dial lists are used and maintained in

10 the telemarketing industry. Similarly, I am familiar and have experience with, and know how to use,

11 databases containing cell block identifiers and ported number lists, both of which identify cellular type

12 telephone numbers and are typically used in these industries. Cell block identifiers are used to identify

13 numbers assigned as wireless numbers, and ported number lists are used to identify any phone

14 numbers that have either been ported from wireless to landline or landline to wireless.

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16 Over the last twenty-four (24) years, I also have had extensive experience in a broad range of

17 other areas in the electronic and information technology fields and obtained many certifications such

18 as MCP 4.0, A+, Network+, MCP 2000, MCSA, MCSE, Linux+, I-Net+, Security+, CIW Security

19 Analyst. From the hardware perspective, I have extensive experience in troubleshooting and repairing

20 at the component level and building various systems for various purposes. I have designed, built, and

21 maintained computer networks in a variety of environments from commercial businesses to very large

22 Department of Defense networks. I have taught approximately 1,000 others the skills to become

23 network engineers.

24   I have extensive experience in dealing with security breaches and hardening computer

25 networks against those breaches. I have handled many computer forensic and E-Discovery matters,

26 including directing internal investigations in companies, working at the FBI sponsored Regional

27 Computer Forensics Laboratory, and founding a computer forensics and E-Discovery firm over six

28 years ago. (*See* Exhibit A – Resume of Jeffrey A. Hansen).

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CASE NO. 2:13-CV-01533-JLR
EXPERT REPORT OF JEFFREY A. HANSEN

1   I have been called to testify in the following civil matters:

2   • *Craig Casey v. Valley Center Insurance Agency Inc.*, Case No. 37-2008-00004378-SC-SC-

3   CTL (San Diego Superior Court);

4   • *Stemple v. QC Holdings*, Case No. 12-CV-1997-CAB-WVG (S.D. Cal.);

5   • *Hahn v. Massage Envy Franchising*, Case No. 3:12-cv-00153-DMS-BGS (S.D. Cal.);

6   • *Abdeljalil v. Gen. Electric Capital Corp.*, Case No. 12-cv-02078-JAH-MDD (S.D. Cal.);

7   • *Jasminda Webb v. Healthcare Revenue Recovery Group, LLC*, Case No. C 13-0737 JD

8   (N.D. Cal.);

9   • *Amanda Balschmiter v. TD Auto Finance, LLC*, Case No. 2:13-cv-01186 (E.D. Wisc.); and,

10 • *Jordan Marks v Crunch San Diego, LLC*, Case No. 14-CV-0348-BAS-BLM (S.D. Cal).

11 *Work and Analyses in this Case Regarding Appstack's outbound dial list.*

12 My tasks in this case included examining the data – the list provided by Defendant during

13 discovery – relating to their calls during the Class Period. I then made specific inquiries relating to

14 the total number of calls to landlines and cellphones and the number of unique landline and cellphone

15 numbers that were called. I performed this analysis for both calls nationwide and calls placed to

16 Washington state area codes.

17 I was provided several CSV (Comma Delimited Text files) exported from Defendant's phone

18 system's database through counsel. These CSV files consisted of eight data files Bates Stamped

19 APPSTK000042-054440. I imported these CSV files into a database to allow easier organization and

20 search of the outbound dial lists. I also imported a cell block identifier list and lists of ported numbers

21 both wireless to landline and landline to wireless. The cell block identifier identifies numbers that

22 were assigned as wireless numbers, and the ported number lists, provided by Neustar, identify

23 numbers that have been switched from landline to wireless or wireless to landline. Neustar is the

24 contractor in charge of allocating these phone numbers in North America. I then compared the data

25 provided by the Defendant to the cell block identifier and the ported number lists to obtain the

26 numbers reflected in the following chart:

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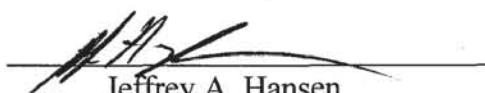|	Landlines	Cellular	Total
Nationwide Total Calls Made	3,314,405	649,154	3,963,559
Nationwide Unique Numbers Called	482,488	90,229	572,717
Average Call Per Unique Number	6.9	7.2	6.9
Washington Total Calls Made	55,688	16,055	71,743
Washington Unique Numbers Calls	8,881	2,338	11,219
Average Call Per Unique Number	6.2	6.7	6.4

The landline totals in the above chart include ported numbers, or those numbers switched from wireless to landline; the cellular totals above also include ported numbers, or those switched from landline to wireless.

Additional Work and Analyses

Additionally, I will be examining future discovery responses and will be formulating additional expert opinions on the topics raised in those discovery responses as requested and appropriate.

Amendments and Modifications.

I reserve the right to amend, modify or supplement the statements and opinions set forth herein as appropriate.

Jeffrey A. Hansen

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CASE NO. 2:13-CV-01533-JLR
EXPERT REPORT OF JEFFREY A. HANSEN

DECLARATION OF JEFFREY A. HANSEN - 16

— **EXHIBIT A** —

Jeffrey A. Hansen
Spring Valley, CA 91977
(619) 270-2363
Email: Jeff@hlforensics.com

SUMMARY OF QUALIFICATIONS:

IT certified professional with over 20 years of extensive troubleshooting experience

PROFESSIONAL EXPERIENCE:

TCPA Class Actions:

- Adams v. Alliance One
- Connor v. JPMorgan/Chase
- Gutierrez v. Barclays
- PATRICIA GAINES v LAW OFFICE OF PATENAUDE & FELIX, A.P.C.
- Mills v HSBC Bank
- Grannan v. Alliant Law Group
- Lemieux v. Global Credit
- Leckler v. CashCall
- Khosroabadi v. National Recovery Agency
- Rose v. Bank of America
- Alberto Malta v The Federal Home Loan Mortgage Corporation a/k/a Freddie Mac, and Wells Fargo Bank
- Braun v. Saveology
- Sarabri v. Weltman
- Robinson v. Midland Credit Management
- Allen v. Portfolio Recovery
- Picchi v. World Financial Network Bank
- Zyboro v. National Credit Systems Inc. (NCSPlus)
- Aboudi v. T-Mobile USA, Inc.
- Carville v. Samsung Telecommunications America
- Astrahan v. Pacific Telecom Communications Group
- Knutson v. Schwan's Home Service, Inc.
- Lemieux v. EZ Lube
- Molnar v. NCO Financial Systems, Inc.
- Stemple v. QC Holdings
- Murdock v. Western Dental
- Hunter v. Palisades Collection
- Tarizzo v. United Agencies, Inc.
- Rodriguez v. Allied Interstate, LLC
- Neuls and Adee, et al v. Dish Network, LLC
- Couser v Comenity Bank
- ABDELJALIL v GENERAL ELECTRIC CAPITAL CORPORATION
- ASHLEE WHITAKER v BENNETT LAW
- Kreul, Jason vs. Commonwealth Financial Systems
- Balschmiter v. TD Auto Finance
- Barrett v. Wesley Financial Group
- CAMPBELL V SALLIE MAE
- JAMES GUSMAN v COMCAST CORPORATION
- Jasminda Webb v Healthcare Revenue Recovery Group
- Joanne Kelso v. Integrity Solution Services
- Josh Friedman v Annas Linens
- Kevin Lemieux v Evans Tire
- Marks v Crunch San Diego

DECLARATION OF JEFFREY A. HANSEN - 18

- Monty J Booth Attorney at Law v AppStack
- Newland v. Rubios
- Nuels v Dish
- Olney v Job.com
- Rinky Dink v. Electronic Merchant Systems
- Robinson v Lojack Corporation
- RUBITH HERNANDEZ v COLLECTION BUREAU OF AMERICA, LTD
- Wingo v. Maddocks Collection Services LLC

Civil Cases:

- Craig Casey vs. Valley Center Insurance Agency Inc.
- Hill v. Allied International Credit Corp
- Hasten v. Target & Target National Bank
- Merry v. Estate Information Services, LLC
- Cynthia Stockwell v CMI
- ALWAN v DIVERSIFIED CONSULTANTS
- GLORIA DAVIS V CITIFINANCIAL CORPORATION
- John Lefler v. One Main Financial
- Mashiri v. Ocwen
- Toney v. Quality Resources
- Murray, Michael v. Diversified Consultants
- Glotfelty v. Aurora Loan Services, LLC
- Ziglar v GE Capital Retail Bank

- Hill v. Capital One

- Hill v. Redline Recovery

- Glotfelty, John v. Aurora Loan Service

Call Recording Class Actions:

- NEI Contracting v. Hanson Aggregates Pacific
- **Nader v. Capital One Bank (U.S.A.), N.A.**

Other Class Actions:

- Hahn v Massage Envy Franchising

Testified in the following:

> I have been called to testify in Craig Casey v. Valley Center Insurance Agency Inc. (San Diego Superior Court Case No: 37-2008-00004378-SC-SC-CTL), Stemple v. QC Holdings (Southern District of California Case no: 12-CV-1997-CAB-WVG), Hahn v. Massage Envy Franchising, (Southern District of California Case No: 3:12-cv-00153-DMS-BGS), Abdeljalil v. General Electric Capital Corporation, (Southern District of California Case No: 12-cv-02078-JAH-MDD), Jasminda Webb v. Healthcare Revenue Recovery Group, LLC. (Northern District of California Case No: C 13-0737 JD), AMANDA BALSCHMITER v TD AUTO FINANCE, LLC (UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN Case No: 2:13-cv-01186), Jordan Marks v Crunch San Diego, LLC (Southern District of California Case No. 14-CV-0348-BAS (BLM)) and I have served as an expert in over fifty (50) TCPA class action lawsuits.

2013-Present   Founder
        Hansen Legal Technologies, Inc., San Diego, CA
- Established and incorporated Hansen Legal Technologies, Inc. in 2013

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- Developed operating procedures for computer forensic examinations.
- Developed proper protocols in preserving electronic evidence and following chain of custody.
- Provided Forensic services for clients for class action, civil, and other consumer cases.
- Oversee all discovery phase of cases.
- Assist counsel in interrogatories, depositions, and meet and confer meetings.
- Participated in Meet and Confer, 26f conferences and misc pre-trial meetings.
- Assisted counsel in developing litigation strategies in cases
- Assisted counsel in preparing discovery including interrogatories and document requests
- Assisted counsel in evaluating responses to interrogatories and document requests
- Assisted counsel in witness examination in depositions.
- Prepaired declarations for Class Certifications, and for Motions for Summary Judgement.

2007-2013   Co-Founder
Hansen and Levey Forensics, Ft Lauderdale, FL
- Established and incorporated Hansen & Levey Forensics, Inc in 2007
- Established secure forensics laboratory for the San Diego office.
- Developed operating procedures for computer forensic examinations.
- Developed proper protocols in preserving electronic evidence and following chain of custody.
- Provided Forensic services for clients for class action, employment, civil, domestic, and juvenile cases.
- Oversee all discovery phase of cases.
- Assist counsel in interrogatories, depositions, and meet and confer meetings, and preparation for sanction hearings against opposing counsel and parties.
- Participated in Meet and Confer, 26f conferences and misc pre-trial meetings.
- Assisted counsel in developing litigation strategies in cases
- Assisted counsel in preparing discovery including interrogatories and document requests
- Assisted counsel in evaluating responses to interrogatories and document requests
- Assisted counsel in witness examination in depositions
- Performed on site acquisitions.
- Participated in mediation sessions.
- Provided Expert Testimony in Craig Casey vs. Valley Center Insurance Agency Inc.

2000-Present   Owner
Pns724 San Diego, CA
- Provided complete IT solutions for hundreds of businesses and individuals including network design, configuration, forensics, and data recovery.
- Set up and maintained 672 line outbound call center with numerous auto dialers and predictive dialers. Maintained call lists, and DNC lists used to place hundreds of millions of calls over a five year period.
- Installed hundreds of POTS lines, "Turned up" at least 38 T1's and PRI's.

2006   San Diego Regional Computer Forensics Laboratory (FBI sponsored computer forensics Lab)
- Built several forensic machines with large fiber channel RAID assemblies for use in the field.
- Installed and configured systems for mobile laboratory
- Provided support in all areas from taking in evidence to calling case agents to pick up their evidence from finished cases gaining valuable experience in evidence handling.

2004-Present   Systems Analyst
Amsec San Diego, CA / Lateott Bremerton, WA / HP Enterprise Services
- Provided ATM and Ethernet fiber connectivity for secure and unsecured DOD networks.
- Troubleshot fiber connectivity issues on shore and ship facilities.

2000-2004   Director of Training/ IT Director
Laptop Training Solutions, San Diego, CA

- Provided Intrusion detection, incident response, and forensic services in a continuing effort keep the network and workstations secure.

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- Planned, designed, and implemented network security for vital network services for 4 facilities, that were heavily attacked by varying methods, saving the company hundreds of thousands of dollars.
- Performed security risk assessment, performed IT control audits, developed countermeasures and provided a security policy to insure confidentiality, integrity and availability of resources.
- Performed Gap Analysis of existing systems and desired systems and migrated from Windows 2000 DNS and Exchange 2000 servers to Linux servers running Postfix and BIND to provide a more scalable network for 4 facilities providing the company the means to achieve a 450% growth.
- Planned, installed and maintained several school networks involving numerous Domain Controllers, UNIX servers, print servers, multiple nodes and routers.
- Installed and programmed Nortel phone system improving the company's ability to handle calls.
- Planned, organized and instructed computer certification courses including Microsoft Certified Systems Engineer (NT4.0, Win2000 MCSE, 2003 MCSE), Cisco (CCNA), A+, N+, Linux+, I-Net+, Security+, MOUS and Web Page Design (HTML, Javascript, DHTML, Flash 4, Flash 5, Fireworks3, Photoshop 5) resulting in hundreds of certified students.
- Provided students with a hands on training environment involving networks with Multiple Windows NT and Windows 2000 Domain Controllers, several workstations (Windows 95,98,NT,ME, and 2000 Professional), Novell, Unix, and Exchange Servers, and Cisco routers.
- Planned, organized and instructed a corporate training environment for TCP/IP which included addressing, standards, troubleshooting, subnetting, routing and Frame Relay
- Provided long distance support via telephone to hundreds of MCSE students throughout the country.
- Managed other instructors on training techniques for the MCSE, CCNA, Linux+, A+, Security+ and Network + courses providing a consistent system of training in all facilities.

1998-2000   Electronic Test Technician 3
Action Instruments, San Diego, CA
- Tested various types of electronics for industry and signal conditioning.
- Troubleshot and documented nearly 10,000 component level repairs.
- Assisted in improvements to the manufacturing process.
- Identified problems in product design and provided solutions to correct the problems.

1996-1997   Network, Computer and Computer Monitor Technician /Instructor
United States Navy, Shore Intermediate Maintenance Activity, San Diego, CA
- Installed and connectorized fiber optic computer networks throughout Naval Station San Diego and North Island.
- Provided network troubleshooting and management for large scale mission-critical DoD networks with over 600 nodes, routers, and servers.
- Provided upgrades, maintenance, troubleshooting, security, and repair of personal computers for 600 station LAN and the US Pacific Fleet.
- Troubleshot and repaired over 100 computer monitors to component level without technical manuals.
- Increased successful monitor repair from 10% to 95%.
- Trained shop personnel on computer monitor troubleshooting and repair.
- Researched parts, materials and techniques for Computer Monitor repair.
- Developed curriculum and instructed monitor troubleshooting and repair for the Navy Microcomputer Repair course.

1993-1996   Electronics Technician / Computer Technician
United States Navy, USS Mahlon S. Tisdale (FFG-27), Combat Systems Division.
- Provided incident response and performed forensic type of services for 36 computers following Employee sabotage.
- Troubleshot and maintained Harris 300 AN/UYK-62(V) mini-mainframe, running Vulcan OS, and all terminals
- Troubleshot, maintained, and upgraded hardware and software for 36 shipboard computers.
- Identified security threats, and developed countermeasures for computer systems on board.
- Troubleshot, repaired and maintained – at component level - various Univac systems making up a complex network of computers used in communications, navigation, and weapons guidance.
- Assisted in planning and running work center.

1990-1992   Radio, Television, VCR Technician

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LBJ Television, Wheat Ridge, CO
- Performed component level troubleshooting of televisions, VCRs, and stereos.
- Performed in home repair of televisions.
- Introduced the repair of CD players to the company.
- Provided technical support to customers over the telephone.
- Handled customer service issues related to television repair.

CERTIFICATIONS:

MCP 4.0, A+, Network+, MCP 2000, MCSA, MCSE, Linux+, I-Net+, Security+, CIW Security Analyst.

Certified by Bureau For Private Postsecondary And Vocational Education, in the States of California and Oregon, as an Instructor for Computer Installation and Repair Technology, Computer Systems Networking and Telecommunications, Micro Computer Applications, Microsoft, Windows, Excel

GUEST APPEARANCES:

- Featured in Microsoft Redmond Magazine Sep 2007
- Computer Talk 760 KFMB San Diego, CA
- Computer Bits KBNP 1410AM and KOHI 1600 Portland, OR
- San Diego Profiler 760 KFMB San Diego, CA

PUBLIC POSITIONS:

June 2012-Present   Board Member, Spring Valley Community Planning Group

Elected board member of the Spring Valley Community Planning Group from April 2012 to Present. The purpose of the group is to advise the San Diego County Department of Planning and Land Use, the Planning Commission and the Board of Supervisors on matters of planning and land use affecting Spring Valley south of Highway 94. Members are volunteers and locally elected representing the interests of the people of Spring Valley. Items heard by the group include but are not limited to: Site Plans, Signs, Roads & Infrastructure, Parks & Recreation, Lot Splits, 2nd Dwelling Units, Day Care, Alcohol License, Tree Removal, Re-Zones.

EDUCATION:
2006   Access Data Forensic Toolkit
        San Diego Regional Computer Forensics Laboratory, San Diego, CA
2006   Guidance Software Encase Forensic Suite
        San Diego Regional Computer Forensics Laboratory, San Diego, CA
2005   E-discovery – Why Digital is different – by Craig Ball
        San Diego County Bar Association, San Diego, CA
2003   Security: Hardening MS Windows 2000 Server Family, IIS and Exchange 2000 Servers
        CBI Systems Integrators, San Diego, CA
1996   Navy Standard Microcomputer Repair
        PRC Inc., San Diego, CA
1996   Fundamentals of Total Quality Management/ Team Skills and Concepts
        Shore Intermediate Maintenance Activity, San Diego, CA
1993   AN/SPS-55 Surface Search Radar
        Service School Command, San Diego, CA
1993   Advanced Electronics School, Communication Systems and Radar Systems
        Naval Training Center, Great Lakes, IL
1992   Electronic Theory
        Naval Training Center, Orlando, FL
1990-1991   Radio, Television, VCR Repair
        Warren Occupational Technical Center, Golden, CO
1989-1990   Electronic Theory

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      Warren Occupational Technical Center, Golden, CO
1991   Columbine Sr. High School, Littleton, CO

SECURITY CLEARANCE: Secret

References available on request

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